

WINSTON & STRAWN LLP
101 California Street
San Francisco, CA 94111-5894

Nicole M. Norris (SBN 222785)
WINSTON & STRAWN LLP
101 California Street, Suite 3900
San Francisco, CA 94111-5894
Telephone: 415-591-1000
Facsimile: 415-591-1400
Email: nnorris@winston.com

James F. Hurst (*Admitted Pro Hac Vice*)
David J. Doyle (*Admitted Pro Hac Vice*)
Samuel S. Park (*Admitted Pro Hac Vice*)
WINSTON & STRAWN LLP
35 W. Wacker Drive
Chicago, IL 60601-9703
Telephone: 312-558-5600
Facsimile: 312-558-5700
Email: jhurst@winston.com; ddoyle@winston.com;
spark@winston.com

Charles B. Klein (*Admitted Pro Hac Vice*)
WINSTON & STRAWN LLP
1700 K Street, N.W.
Washington, D.C. 20007
Telephone: 202-282-5000
Facsimile: 202-282-5100
Email: cklein@winston.com

Attorneys for Defendant
ABBOTT LABORATORIES

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

MEIJER, INC. & MEIJER DISTRIBUTION,)
INC., on behalf of themselves and all others)
similarly situated,)
Plaintiffs,)
vs.)
ABBOTT LABORATORIES,)
Defendant.)
[caption continues next page]

Case No. C 07-5985 CW

Related by Order to:

Case No. C 04-1511 CW

**[PROPOSED] ORDER GRANTING
ABBOTT LABORATORIES' MOTION TO
COMPEL PRODUCTION OF
DOCUMENTS AND INTERROGATORY
RESPONSES**

WINSTON & STRAWN LLP
101 California Street
San Francisco, CA 94111-5894

ROCHESTER DRUG CO-OPERATIVE, INC.,
on behalf of itself and all others similarly
situated,

Plaintiffs,

vs.

ABBOTT LABORATORIES,

Defendant.

LOUISIANA WHOLESALE DRUG
COMPANY, INC., on behalf of itself and all
others similarly situated,

Plaintiffs,

vs.

ABBOTT LABORATORIES,

Defendant.

Case No. C 07-6010 CW

Related by Order to:

Case No. C 04-1511 CW

**[PROPOSED] ORDER GRANTING
ABBOTT LABORATORIES' MOTION TO
COMPEL PRODUCTION OF
DOCUMENTS AND INTERROGATORY
RESPONSES**

The Honorable Judge Wilken

Case No. C 07-6118 CW

Related by Order to:

Case No. C 04-1511 CW

**[PROPOSED] ORDER GRANTING
ABBOTT LABORATORIES' MOTION TO
COMPEL PRODUCTION OF
DOCUMENTS AND INTERROGATORY
RESPONSES**

The Honorable Judge Wilken

1 Having reviewed Abbott Laboratories' Motion to Compel Production of Documents and
2 Interrogatory Responses, as well as the Declarations of Charles B. Klein and Joel Hay, Ph.D. in
3 support of the motion, the Court rules as follows:

4 IT IS HEREBY ORDERED that the motion to compel is granted; and

5 IT IS FURTHER ORDERED that Plaintiffs must produce to Abbott the following documents
6 and information within 5 days of this order:

- 7 (i) a complete answer to Interrogatory No. 3 of Abbott Laboratories' First Set of
8 Interrogatories to Plaintiffs (attached as Ex. B to Declaration of Charles B. Klein);
9 and
10 (ii) all documents requested in this motion responsive to Document Requests Nos. 17, 24,
11 and 25 of Abbott Laboratories' First Set of Requests for Documents and Things to
12 Plaintiffs (attached as Ex. C to Declaration of Charles B. Klein).
13

14 Dated: _____

15 _____
16 THE HONORABLE CLAUDIA WILKEN
17
18
19
20
21
22
23
24
25
26
27
28

WINSTON & STRAWN LLP
101 California Street
San Francisco, CA 94111-5894